

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EMILIO GARCIA,

Plaintiff,

v.

ROC NATION LLC, a Delaware business organization; HOT GIRL TOURING, LLC,

a Delaware Business Organization; MEGAN THEE STALLION ENTERTAINMENT,

INC., a Delaware Business Organization; MEGAN THEE STALLION, an individual; and DOES 1 through 10, inclusive,

Defendants.

Case No. 1:24-cv-7587-GHW

DECLARATION OF RONALD ZAMBRANO, COUNSEL FOR PLAINTIFF, IN RE ORDER TO SHOW WHY HE SHOULD NOT BE SANCTION FOR VIOLATING THE COURT'S ORDER AND FAILURE TO APPEAR AT THE 11/6/24 IN-PERSON CONFERENCE

I, Ronald L. Zambrano, swear under penalty of perjury, pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney duly licensed to practice law in the State of California. I am a partner and Employment Litigation Chair at West Coast Trial Lawyers, APLC, counsel for Plaintiff Emilio Garcia in the above reference matter. My firm's address is 1147 S. Hope Street, Los Angeles, California, 90015. My email address is ron@westcoasttriallawyers.com. Our firm number is 888-888-9285. My direct line is 213-797-5531. I am an attorney in good standing in State

of California, the Northern District of California, the Eastern District of California, the Central District of California, the Southern District of California and the Ninth Circuit Court of Appeals.

2. I respectfully submit this declaration in response to the Court's November 6, 2024, Order (Dkt #57) why I should not be sanctioned for failing to appear in-person to the conference on the same date.

3. I was never served the Court's Order about the November 6, 2024 conference. I have not received a ECF notification since October 4, 2024, the date Judge Hernan D. Vera transferred this case from the Central District of California to the Southern District of New York. (Dkt. #42.) A review of the PACER docket on this matter, PACER/ECF notifications numbered "43" through "57" have not been served to anyone in my office to date.

4. I would not have known of any conference's existence had defense counsel not emailed me on October 22, 2024 to schedule a meet-and-confer meeting.

5. It was not until the October 24, 2024 meet-and-confer meeting with defense counsel that I learned a November 6, 2024 hearing was even set. A draft letter to the judge in anticipation of that conference was provided, and that is when I saw for the first time a case number for the Southern District of New York was issued. I then checked the PACER activity with that case number and found a flurry of ECF activity unbeknownst to anyone at my firm, as well as the Order for the November 6, 2024 (Dkt. #44), which stated:

It is hereby ORDERED that counsel for all parties participate in an initial pretrial conference with the Court at the time listed below. Initial Conference set for 11/6/2024 at 04:00 PM in Courtroom 12C, 500 Pearl Street, New York, NY 10007 before Judge Gregory H. Woods.

6. In retrospect, I should not have assumed that I could have participated in this conference remotely by either telephone or video conference because the word “in-person” was not included in the Court’s order (Dkt. #44). This mistake was compounded by the wide-spread adaptation of remote participation in court hearings in both federal and state courts in California. I believed in good faith that I could participate remotely in the November 6, 2024 hearing.

7. What added to my false hope was the number and access code found in the Court’s Individual Rules of Practice in Civil Cases, Section 2.C “Telephone Conferences.” Again, in retrospect, I made the erroneous assumption remote participation was allowed.

8. Upon discovering on October 24, 2024, for the first time, the flurry of activity since Dkt #42 I emailed the Court’s chambers email in an attempt to expeditiously advise the Court I was not receiving any activity on the matter, I was doing everything possible to catch up and find local counsel. (Attached is a true and correct copy of my October 24, 2024 email as **Exhibit A.**)

9. On November 6, 2024, believing I was able to participate remotely in the hearing of same date, I dialed the number and access code found the Court’s Individual Rules: (888) 557-8511, and enter Access Code 747-0200, followed by the pound (#) key.

10. As reflected in the emails I sent to opposing counsel and the Court during the pendency of the November 6, 2024 hearing (a true and correct copy is attached as **Exhibit B.**), I wrote that I was on hold until 1:10 PT/4:10 ET, when the call ended with an announcement that the conference “is ending now.”

11. Despite requesting what transpired at the hearing, I have yet to hear a response from defense counsel.

12. I did not get an ECF notification of activity #57 regarding the newly set November 18, 2024 hearing, or that it was in-person, or that there was an order to show cause why I should not be sanctioned for failing to appear in person on November 6, 2024. Nor did anyone that was at the hearing give me any news of what transpired.

13. I learned of #57's Order by checking the updated PACER activity on November 7, 2024.

14. I will be participating in-person for the November 18, 2024 conference set for 4:00 pm in Judge Woods courtroom in the Southern District of New York.

15. Based thereon, I respectfully ask the Court not to sanction me for failing to make an in-person appearance for the November 6, 2024, conference. Specifically, based on the above, I believed in good faith in-person participation was not required and I believed I would be able to attend via telephone conference. I apologize to the Court and all counsel for my mistake and for any inconvenience caused by same.

I declare under penalty under the laws of the United States the foregoing is true and correct.

Dated: November 11, 2024



Ronald L. Zambrano, Esq.

EXHIBIT A

From: [Ronald Zambrano](#)
To: WoodsNYSDChambers@nysd.uscourts.gov
Cc: [Nefthaly Rivera](#); [Julian Schoen](#); [Joanna Menillo](#); [Jordan Siev](#); [Kleemann, Michael R.](#); [Nefthaly Rivera](#); [Mari Henderson](#)
Subject: CASE #: 1:24-cv-07587-GHW Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week
Date: Thursday, October 24, 2024 3:40:23 PM
Attachments: [Garcia SDNY docket CM_ECF NextGen Version 1.7.pdf](#)
[Garcia, Emilio- docket attorneys SDNY CM_ECF NextGen Version 1.7.pdf](#)
[image001.png](#)

To the Honorable Court:

I am counsel for Plaintiff Emilio Garcia in the matter transferred from the Central District of California, to Judge Woods' courtroom in the Southern District of New York. Case Number CASE #: 1:24-cv-07587-GHW. Counsel for defendants are copied.

My office has not received any ECF activity since #42, the Order Transferring the matter.

I've accessed the docket and see there are no email listed under my name or that of Neama Rahmani, the other attorney on this matter

That there was any activity came by way of implication when counsel for Defendants sought to meet and confer per Judge Woods' orders. It didn't hit me that there was substantive activity occurring – i.e., an Initial Conference set for 11/6 – till 30 minutes ago during a video conference setup by Defense counsel.

I am currently looking for NY counsel. In the interim, how do I get our emails included in the ECF system so we are notified of filings and activity with the Court?

Thank you in advance.

Sincerely,
Ron



Ronald L. Zambrano
Partner & Employment Litigation Chair
 (888) 888-WCTL (9285)
 westcoasttriallawyers.com
California | Nevada | Arizona | Washington



EXHIBIT B

From: [Ronald Zambrano](#)
To: [Joanna Menillo](#); [Mari Henderson](#); WoodsNYSDChambers@nysd.uscourts.gov
Cc: [Nefthaly Rivera](#); [Julian Schoen](#); [Jordan Siev](#); [Kleinmann, Michael R.](#)
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week
Date: Wednesday, November 6, 2024 1:20:00 PM
Attachments: [image001.png](#)

To the Honorable Court – per the call my Case Manager had with the chambers clerk, I (counsel for Plaintiff in California) am emailing to say that I tried to connect with the phone number and access code below and repeated here:

(888) 557-8511, and enter Access Code 747-0200, followed by the pound (#) key.

We got this from the Judge's Individual Rules. My attempt a few minutes ago resulted in the call hanging up.

I'm still working on getting local counsel.

Please advise,

Thanks,



Ronald L. Zambrano
 Partner & Employment Litigation Chair
 (888) 888-WCTL (9285)
 westcoasttriallawyers.com
 California | Nevada | Arizona | Washington


From: Ronald Zambrano
Sent: Wednesday, November 6, 2024 1:11 PM
To: Joanna Menillo <joannamenillo@quinnemanuel.com>; Mari Henderson <marihenderson@quinnemanuel.com>
Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; Julian Schoen <julianschoen@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Someone please advise?

Thanks in advance,

Ron

From: Ronald Zambrano

Sent: Wednesday, November 6, 2024 1:10 PM

To: 'Joanna Menillo' <joannamenillo@quinnemanuel.com>; 'Mari Henderson' <marihenderson@quinnemanuel.com>
Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; 'Julian Schoen' <julianschoen@quinnemanuel.com>; 'Jordan Siev' <JSiev@ReedSmith.com>; 'Kleinmann, Michael R.' <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

I was on hold saying to wait for the conference to begin. Then it just hung up saying the conference "is ending now."

From: Ronald Zambrano

Sent: Wednesday, November 6, 2024 12:54 PM

To: Joanna Menillo <joannamenillo@quinnemanuel.com>; Mari Henderson <marihenderson@quinnemanuel.com>
Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; Julian Schoen <julianschoen@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

As an FYI, I'm going to try to connect through the number on Judge Woods' Individual Rules of Practice in Civil Case

(888) 557-8511, and enter Access Code 747-0200, followed by the pound (#) key.

From: Ronald Zambrano

Sent: Wednesday, November 6, 2024 11:07 AM

To: Joanna Menillo <joannamenillo@quinnemanuel.com>; Mari Henderson <marihenderson@quinnemanuel.com>
Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; Julian Schoen <julianschoen@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Thank you.

From: Joanna Menillo <joannamenillo@quinnmanuel.com>

Sent: Wednesday, November 6, 2024 10:12 AM

To: Ronald Zambrano <ron@westcoasttriallawyers.com>; Mari Henderson <marihenderson@quinnmanuel.com>

Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; Julian Schoen <julianschoen@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Ron,

We believe you already have copies of the Court's conference order and Judge Woods' individual rules of practice, but out of an abundance of caution, are providing a copy of both here.

Thank you,

Joanna Menillo

Associate

Quinn Emanuel Urquhart & Sullivan, LLP

51 Madison Avenue, 22nd Floor
New York, NY 10010
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212-849-7000 Main Office Number
212-849-7100 FAX

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From: Ronald Zambrano <ron@westcoasttriallawyers.com>

Sent: Wednesday, October 30, 2024 2:21 PM

To: Joanna Menillo <joannamenillo@quinnmanuel.com>; Mari Henderson <marihenderson@quinnmanuel.com>

Cc: Nefthaly Rivera <Nefthaly@westcoasttriallawyers.com>; Julian Schoen <julianschoen@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

[EXTERNAL EMAIL from ron@westcoasttriallawyers.com]

Thanks, Joanna. These dates below worked great for me. I appreciate the accommodation.

Best,
Ron

From: Joanna Menillo <joannamenillo@quinnmanuel.com>
Sent: Wednesday, October 30, 2024 10:53 AM
To: Ronald Zambrano <ron@westcoasttriallawyers.com>; Mari Henderson <marihenderson@quinnmanuel.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Thanks, Ron. We are not opposed to adjusting all dates for 90 days. Jordan and Mike, any objections to that change in the case management schedule? For clarity, that would push the dates out as follows:

- Close of Fact Discovery – July 7
- RFPs – May 8
- Rogs – May 8
- RFAs – June 9
- Deposition end date – July 7
- Affirmative Expert Disclosures – July 7
- Rebuttal Expert Disclosures – July 21
- Close of Expert Discovery – August 21
- MSJ – September 20

Joanna Menillo
Associate
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From: Ronald Zambrano <ron@westcoasttriallawyers.com>
Sent: Wednesday, October 30, 2024 12:59 PM
To: Joanna Menillo <joannamenillo@quinnemanuel.com>; Mari Henderson <marihenderson@quinnemanuel.com>
Cc: Julian Schoen <julianschoen@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

[EXTERNAL EMAIL from ron@westcoasttriallawyers.com]

Hello:

With regards to the dates on the schedule . . . the April 2025 fact discovery cut off is too soon for me. I've 3 massive trials in the first quarter of next year. If we can kick the dates 60-90 days, that works for me.

Please advise.

Thanks,
Ron

From: Joanna Menillo <joannamenillo@quinnemanuel.com>
Sent: Wednesday, October 30, 2024 9:57 AM
To: Ronald Zambrano <ron@westcoasttriallawyers.com>; Mari Henderson <marihenderson@quinnemanuel.com>
Cc: Julian Schoen <julianschoen@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Ron, just following up on the below regarding the case management schedule. We'll plan to file everything with the Court by 4pm unless we hear any objections otherwise. Thanks,

Joanna Menillo
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From: Joanna Menillo

Sent: Tuesday, October 29, 2024 7:02 PM

To: Ronald Zambrano <ron@westcoasttriallawyers.com>; Mari Henderson <marihenderson@quinnmanuel.com>

Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Thanks, Ron. We'll incorporate and get on file tomorrow. Can you also confirm that you are OK with the dates listed in the proposed case management order that Mari sent in her original email? We'll be filing that along with the joint letter to the Court tomorrow.

Thanks,

Joanna Menillo

Associate

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From: Ronald Zambrano <ron@westcoasttriallawyers.com>

Sent: Tuesday, October 29, 2024 3:53 PM

To: Mari Henderson <marihenderson@quinnmanuel.com>

Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

[EXTERNAL EMAIL from ron@westcoasttriallawyers.com]

Mari – here's the letter with my additions in redline.

Thank you,
Ron

From: Ronald Zambrano <ron@westcoasttriallawyers.com>
Sent: Tuesday, October 29, 2024 7:56 AM
To: Mari Henderson <marihenderson@quinnmanuel.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: Re: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Yes. Later today.

Ron Zambrano

From: Mari Henderson <marihenderson@quinnmanuel.com>
Sent: Tuesday, October 29, 2024 7:53:17 AM
To: Ronald Zambrano <ron@westcoasttriallawyers.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: Re: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Hi Ron,

Following up to confirm you will provide your inserts to the letter today ahead of the joint filing tomorrow.

If we don't receive your inserts by 6 pm ET, we will adjust our letter to the court accordingly, advising that we did not receive a timely response after meet and confer efforts.

Thank you,
Mari

From: Mari Henderson <marihenderson@quinnmanuel.com>
Sent: Sunday, October 27, 2024 6:47 PM
To: Ronald Zambrano <ron@westcoasttriallawyers.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>

<joannamenillo@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: Re: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Hi Ron,

We did not receive your inserts to the joint letter on Friday. Can you please confirm you will provide the joint letter to us tomorrow, along with confirmation of your agreement to the case management schedule we filled out for Judge Woods?

As a reminder, these are due to be jointly filed October 30. We can handle the filing so long as you timely provide us with your inserts for review.

Thank you,

Mari

From: Mari Henderson <marihenderson@quinnemanuel.com>

Sent: Thursday, October 24, 2024 9:00 AM

To: Ronald Zambrano <ron@westcoasttriallawyers.com>

Cc: Julian Schoen <julianschoen@quinnemanuel.com>; Joanna Menillo

<joannamenillo@quinnemanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>

Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Yes, I will send a Zoom invite for 3 pm PT today.

Thanks,

Mari

Mari Henderson

Associate

Quinn Emanuel Urquhart & Sullivan, LLP

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strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Ronald Zambrano <ron@westcoasttriallawyers.com>
Sent: Wednesday, October 23, 2024 10:25 PM
To: Mari Henderson <marihenderson@quinnmanuel.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: RE: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

[EXTERNAL EMAIL from ron@westcoasttriallawyers.com]

Counsel – I'm available tomorrow (Thursday) from 3-4. That still work?

Ron

From: Mari Henderson <marihenderson@quinnmanuel.com>
Sent: Tuesday, October 22, 2024 3:27 PM
To: Ronald Zambrano <ron@westcoasttriallawyers.com>; Filings <Filings@westcoasttriallawyers.com>
Cc: Julian Schoen <julianschoen@quinnmanuel.com>; Joanna Menillo <joannamenillo@quinnmanuel.com>; Jordan Siev <JSiev@ReedSmith.com>; Kleinmann, Michael R. <MKleinmann@ReedSmith.com>
Subject: Garcia v. Megan thee Stallion, Roc Nation, et. al. - Meet and Confer this week

Dear Mr. Zambrano,

Following the transfer to New York and reassignment to Judge Woods, the parties have been ordered to prepare a joint filing due October 30 and directed to meet and confer prior to filing the joint letter. We have prepared a first draft of the joint filing, with highlights to indicate where Plaintiff's position needs to be inserted. We have also prepared the civil case management plan and scheduling order as Judge Woods requires, attached. Please review both, provide any additions and return back to us for review Friday prior to the joint filing next week.

Please let us know when you are available to meet and confer this week. We are available tomorrow or Thursday between 12 pm PT – 4 pm PT. Please also let us know if your client has retained New York counsel so they can be included in the joint filing and the meet and confer.

Thank you,

Mari

Mari Henderson

Associate

Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
213-443-3364 Direct
213-443-3000 Main Office Number
213-443-3100 Fax
marihenderson@quinnmanuel.com
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1 CERTIFICATE OF SERVICE
2
3

4 I am over the age of 18 and am not a party to the above-captioned matter.
5
6

7 On November 12, 2024, I served the documents listed below on the Defendants by
8 automatic electronic transmission via the Court's Case Management and Electronic Case Filing
9 practice as follows:
10
11

12 Mari F. Henderson
13
14 marihenderson@quinnemanuel.com

15 Joanna Elizabeth Menillo
16 joannamenillo@quinnemanuel.com

17 Julian Toca Schoen
18
19

20 julianshoen@quinnemanuel.com

21 Janet C. Shamilian
22
23

24 Alex B. Spiro
25
26

27 Quinn Emanuel Urquhart & Sullivan, LLP
28

865 South Figueroa Street
10th Floor

Los Angeles, CA 90017
310-386-2006

//
//
//

1 Michael Kleinmann

2 mkleinmann@reedsmith.com

3 Jordan W. Siev

4 jsiev@reedsmith.com

5 Reed Smith LLP

6 355 S Grand Avenue

7 Ste 2900

8 Los Angeles, CA 90071

9
10 The documents served on November 12, 2024 are:

11
12 DECLARATION OF RONALD ZAMBRANO, COUNSEL FOR PLAINTIFF, IN RE
13 ORDER TO SHOW WHY HE SHOULD NOT BE SANCTION FOR VIOLATING THE
14 COURT'S ODER AND FAILURE TO APPEAR AT THE 11/6/24 IN-PERSON CONFERENCE

15
16 Dated: November 12, 2024

17 WEST COAST EMPLOYMENT LAWYERS, APLC

18 By

19 
20 _____
21 Ronald L. Zambrano, Esq.
22 Attorney for Plaintiff,
23 EMILIO GARCIA